

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AMAZON.COM, INC.
REDIRECTED FROM WITNESS XIE
(AMZ/USPS-T2-1-2)

The United States Postal Service hereby provides its responses to the following interrogatories of Amazon.com, Inc.: AMZ/USPS-T2-1-2, filed on November 13, 2001. These interrogatories were redirected from witness Xie.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
November 27, 2001

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF AMAZON.COM, INC.
(REDIRECTED FROM WITNESS XIE)

AMZ/USPS-T2-1. In Docket No. R2000-1, witness Bradley, USPS-T-18, at page 26, Table 4, provided the results of the then most recent survey by PricewaterhouseCoopers of the average size of trailers in leased trailer fleets.

a. Has the Postal Service updated this survey since Docket No. R2000-1? If so, please provide the results in a format similar to that provided in witness Bradley's Table 4.

b. Does the Postal Service have data which indicate the largest size trailers in use in its leased fleets? If so, please provide.

c. Over the past 15 years, has there been a tendency for the average cubic capacity of trailers in the Postal Service's leased fleet to increase? Please provide all data on which you rely for your answer.

RESPONSE:

a. No.

b. According to the survey, the largest trailers in the fleets are 53 foot trailers which have a cube of 3,200 cubic feet. See page 4 of LR-I-85/R2000-1 (Attachment 1).

c. The Postal Service has collected data on trailer size only in recent years. Between 1996 and 1999 (the two years that surveys were done) the average trailer size increased slightly from 2,610 cubic feet in 1996 to 2,715 in 1999. The data on which these calculations are based are from the surveys of the leased trailer fleets from Docket No. MC97-2, USPS-LR-PCR-13 (Attachment 2) and Docket No. R2000-1 (see Attachment 1).

Power-Only Highway Contract Survey Documentation

1 PURPOSE

It is common for Bulk Mail Centers (BMC) to have highway contracts that specify only the power units, or the tractor portion, of the tractor-trailer, hence the name, power-only contracts. The BMCs then provide the trailer to the contractor. The purpose of this survey is to determine the size and quantity of the trailers used with these power-only highway contracts.

2 RESULTS

The following table presents the results of the survey. All 21 BMCs which were contacted for this study provided responses.

Area	Power-Only Contracts	53-ft (3200 cuses)	48-ft (3000 cuses)	45-ft (2700 cuses)	40-ft (2400 cuses)	28-ft (1650 cuses)	Tandem 28-ft	Proportion Tandem 28-ft	Other Sizes	Area Average Cubic Ft.
Allegheny	Y	0	0	170	90	0	N	-	-	2,566
Great Lakes	Y	0	0	687	18	0	N	-	-	2,692
Mid-Atlantic	N	0	0	0	0	0	N	-	-	0
Mid-West	Y	0	418	423	0	0	N	-	-	2,849
New York Metro	Y	500	3	508	1673	82	N	-	-	2,578
New York - San Juan	N	0	0	0	0	0	N	-	-	0
Northeast	Y	0	27	677	48	0	N	-	-	2,692
Pacific	Y	0	437	0	0	59	N	97%	-	3,012
Southeast	Y	0	160	108	0	0	N	-	-	2,879
Southwest	Y	0	405	561	146	0	N	-	-	2,770
Tenn	Y	61	0	3	0	90	Y	100%	-	3,228
Wash - Seattle	N	0	0	0	0	0	N	-	-	0
Wash - Portland Metro	N	0	0	0	0	0	N	-	-	0

3 DATA COLLECTION PLAN

The universe for this study was all of the Bulk Mail Centers in the United States. Since this study is based on the population, a sampling plan was not used. The table above lists each area included in the study.

Power-Only Highway Contract Survey Documentation

1 PURPOSE

It is common for Bulk Mail Centers (BMC) to have highway contracts that specify only the power units, or the tractor portion, of the tractor-trailer; hence the name, power-only contracts. The BMCs then provide the trailer to the contractor. The purpose of this survey is to determine the size and quantity of the trailers used with these power-only highway contracts.

2 RESULTS

The following table presents the results of the survey. Of the 21 BMCs which were contacted for this study, one did not respond. The non-respondent is the Mid-West Area BMC located in St. Paul, Minnesota.

Area	BMC	Power-Only Contracts, by Area	Power-Only Contracts, by BMC	53-ft (3200 cubes)	48-ft (3000 cubes)	45-ft (2700 cubes)	40-ft (2400 cubes)	28-ft (1650 cubes)	Tandem 28-ft	Proportion Tandem 28-ft	Other Sizes	Area average cubic ft.
Allegheny	Cincinnati	15	15	5	10	371	102	0	N	-	-	2,649
Allegheny	Philadelphia		0	0	0	0	0	0	N	-	-	
Allegheny	Pittsburgh		0	0	0	0	0	0	N	-	-	
Great Lakes	Allen Park	22	14	0	0	245	30	0	N	-	-	2,817
Great Lakes	Chicago		8	0	225	0	0	0	N	-	-	
Mid-Atlantic	Greensboro	0	0	0	0	0	0	0	N	-	-	0
Mid-Atlantic	Washington DC		0	0	0	0	0	0	N	-	-	
Mid-West	Des Moines	61	15	0	210	0	0	0	N	-	-	2,918
Mid-West	Kansas City		21	0	0	137	0	0	N	-	-	
Mid-West	Minn/St. Paul								N	-	-	
Mid-West	St. Louis		25	0	208	20	0	0	N	-	-	
New York Metro ¹	New Jersey	22	22	0	0	495	1682	99	N	-	-	2,433
Northeast	Springfield	17	17	0	0	153	0	0	N	-	-	2,700
Pacific	Los Angeles	33	20	0	380	0	0	2	Y	100%	-	2,854
Pacific	San Francisco		13	0	57	0	0	51	Y	100%	-	
Southeast	Atlanta	0	0	0	0	0	0	0	N	-	-	0
Southeast	Jacksonville		0	0	0	0	0	0	N	-	-	
Southeast	Memphis		0	0	0	0	0	0	N	-	-	
Southwest	Dallas	0	0	0	0	0	0	0	N	-	-	0
Western	Denver	0	0	0	0	0	0	0	N	-	-	0
Western	Seattle	14	14	44	0	2	0	59	Y	100%	-	2,320

3 DATA COLLECTION PLAN

The universe for this study was all of the Bulk Mail Centers in the United States. Since this study is based on the population, a sampling plan was not used. The table above lists each BMC included in the study and its area.

¹ This library reference contains the updated response from the New York Metro Area BMC. The initial survey response form which was received incorrectly indicated that there were no power-only contracts at that BMC.

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AMZ/USPS-T2-2.

The maximum weight of a trailer may vary by state and by the number of axles on the trailer. Recognizing that there is no uniform national weight limit, what does the Postal Service consider to be the maximum capacity, in terms of both total trailer weight and net weight of cargo, of (i) the four or five most commonly-used trailers in its leased trailer fleets, and (ii) the largest trailers in its leased fleets?

RESPONSE:

The Postal Service does not set a maximum capacity for total trailer weight. For net weight or cargo (or payload), the Postal Service specifies 47,500 pounds for its full-length (40 feet to 53 feet) trailers.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
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